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RECEIVED Of Counsel

H LaDon Baltimore

2004 MAR 24 PM 4:15

U.S. DISTRICT COURT
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*Also licensed in KY

**Also licensed in AL

March 24, 2004

Tennessee Regulatory Authority
ATTN Sharla Dillon
460 James Robertson Parkway
Nashville, TN 37238

04-00092

Re Petition of Knology of Tennessee, Inc to Amend Its Certificate of Convenience
and Necessity

Dear Sharla:

Enclosed please find the original and thirteen (13) copies of the Petition of Knology of
Tennessee, Inc to Amend Its Certificate of Convenience and Necessity Also enclosed is my
check in the amount of \$25.00 in payment of the filing fee

Thank you for your assistance Please contact me if you have any questions

Sincerely,



H LaDon Baltimore
Attorney for Knology of Tennessee, Inc

LDB/dcg
Enclosures

cc John Feehan
Linda Lowrance
ILECs of record

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**Petition of Knology of Tennessee, Inc.
to Amend Its Certificate of Convenience
and Necessity**

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Docket No. _____

PETITION

Knology of Tennessee, Inc ("Knology") petitions the Tennessee Regulatory Authority ("TRA") to amend Knology's certificate of convenience and necessity to allow Knology to offer telecommunications services to customers located in the services areas of Concord Telephone Exchange, Tennessee Telephone Company, Tellico Telephone Company, and Humphreys County Telephone Company (hereafter collectively "TDS" or "the Company").

As evidenced by a separate filing made today, Knology and TDS have entered into an interconnection agreement and submitted that agreement to the TRA for approval. Knology presently has a certificate of public convenience and necessity as a Competing Telecommunications Services Provider (Docket 00-00058, order issued May 22, 2000). Consistent with the law in effect at that time, Knology's certificate prohibited the carrier from offering service in areas served by incumbents, such as TDS, with fewer than 100,000 total access lines "unless such company voluntarily enters into an interconnection agreement with a competing telecommunications services provider." T C A § 65-4-201(d). As precedent, the TRA granted an amendment to the Certificate of Convenience and Necessity to XO Tennessee, Inc to provide service in the service areas of TDS, Docket No 03-00567, Order dated February 23, 2004. TDS

and Knology have now entered into such an agreement and it is therefore appropriate to amend Knology's certificate accordingly

WHEREFORE, petitioner respectfully requests the TRA to amend its certificate of public convenience and necessity as set forth above and grant any other relief as the TRA may deem just and proper.

Respectfully submitted,



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Counsel to Knology of Tennessee, Inc.

Certificate of Service

The undersigned hereby certifies that on this the 24th day of March, 2004, a true and correct copy of the foregoing has been forwarded via first class U S Mail, hand delivery, or overnight delivery to the following

Ardmore Telephone Company, Inc
P O Box 549
517 Ardmore Avenue
Ardmore, TN 38449.

BellSouth
333 Commerce Street
Nashville, TN 37201-3300

Century Telephone of Adamsville
P.O Box 405
116 N. Oak Street
Adamsville TN 38310

Century Telephone of Claiborne

P O Box 100

507 Main Street

New Tazewell, TN 37825

Century Telephone of Ooltewah-Collegedale, Inc.

P O Box 782

5616 Main Street

Ooltewah, TN 37363

Citizens Communication Company of Tennessee

P O Box 770

300 Bland Street

Bluefield, WV 24701

Citizens Communication Company of the Volunteer State

P O. Box 770

300 Bland Street

Bluefield, WV 24701

Loretto Telephone Company, Inc

P O. Box 130

Loretto, TN 38469

Millington Telephone Company, Inc

P O Box 429

4880 Navy Road

Millington, TN 38083-0429

Sprint-United

112 Sixth Street

Bristol, TN 37620

TDS Telecom-Concord Telephone Exchange, Inc

P O Box 22610

701 Concord Road

Knoxville, TN 37933-06 10

TDS Telecom-Humphreys County Telephone Company

P.O. Box 552

203 Long Street

New Johnsonville, TN 37134-0552

TDS Telecom-Tellico Telephone Company, Inc
P O Box 9
102 Spence Street
Tellico Plains, TN 37385-0009

TDS Telecom-Tennessee Telephone Company
P O. Box 18139
Knoxville, TN 37928-2139

TEC-Crockett Telephone Company, Inc
P O Box 7
Friendship, TN 38034

TEC-People's Telephone Company, Inc.
P O Box 310
Erin, TN 37061

TEC-West Tennessee Telephone Company, Inc
P O Box 10
244 E. Main Street
Bradford, TN 38316

United Telephone Company
P O Box 38
120 Taylor Street
Chapel Hill, TN 37034


H LaDon Baltimore